

EXHIBIT 15

FILED UNDER SEAL

In the Matter Of:

FAIR ISAAC CORPORATION

vs

FEDERAL INSURANCE COMPANYT, ET AL.

TAMRA PAWLOSKI

January 18, 2019

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<p style="text-align: right;">Page 174</p> <p>1 Q So you did have conversations</p> <p>2 about the pricing methodology used by FICO,</p> <p>3 just after this March 2nd letter?</p> <p>4 A Correct.</p> <p>5 Q I am handing you what I have</p> <p>6 marked Exhibits 258 and 259.</p> <p>7 (The above described documents were</p> <p>8 marked Exhibits 258 and 259 for</p> <p>9 identification as of this date.)</p> <p>10 Q Are you familiar with these</p> <p>11 documents?</p> <p>12 A Yes.</p> <p>13 Q So 259 is a second copy of page</p> <p>14 2 of 258, because you can't really read.</p> <p>15 You only got one page of 258?</p> <p>16 A Yes.</p> <p>17 MS. KLIEBENSTEIN: Then together</p> <p>18 we have a complete document.</p> <p>19 Q Looking at 258 and 259, is</p> <p>20 Exhibit 259 the letter that was e-mailed to you</p> <p>21 from Mike Sawyer on March 6, 2016?</p> <p>22 A Yes, it was.</p>	<p style="text-align: right;">Page 176</p> <p>1 He did not provide that on the</p> <p>2 phone.</p> <p>3 Q Do you recall anything else that</p> <p>4 was discussed in that phone call?</p> <p>5 A No, I was not lead on the call.</p> <p>6 Q You mentioned the name Bill</p> <p>7 Harlan?</p> <p>8 A Harlam.</p> <p>9 Q Who was he?</p> <p>10 A He was my new boss.</p> <p>11 Q And your old boss was?</p> <p>12 A Bill Stickle.</p> <p>13 Q Bill Stickle. Did Bill Harlam</p> <p>14 come from legacy ACE?</p> <p>15 A Yes, he did.</p> <p>16 Q What was Bill Harlam's role at</p> <p>17 Chubb LTD?</p> <p>18 A He was the head of vendor</p> <p>19 management.</p> <p>20 Q So, did the vendor management,</p> <p>21 after the merger did the vendor management</p> <p>22 functions of ACE and Chubb merge together as a</p>
<p style="text-align: right;">Page 175</p> <p>1 Q And this is four days after the</p> <p>2 date of the letter we looked at in 257, is that</p> <p>3 correct?</p> <p>4 A That's correct.</p> <p>5 Q So between March 2nd and March</p> <p>6 6th, did you have any conversations with FICO</p> <p>7 personnel about the business negotiations?</p> <p>8 A Yes.</p> <p>9 Q And what were those</p> <p>10 conversations?</p> <p>11 A Actually at this point it got</p> <p>12 escalated to my leadership.</p> <p>13 So Bill Harlam and myself had a</p> <p>14 discussion with Bill Waid on the numbers to</p> <p>15 help us understand why, we were very confused</p> <p>16 as why they came in so high, so we had a phone</p> <p>17 call with Bill.</p> <p>18 Q What did Bill tell you, what do</p> <p>19 you recall?</p> <p>20 A That he was going to come back</p> <p>21 and give us an explanation for how they came to</p> <p>22 the numbers.</p>	<p style="text-align: right;">Page 177</p> <p>1 group?</p> <p>2 A Yes.</p> <p>3 Q And some people stayed and some</p> <p>4 people went?</p> <p>5 A That's correct.</p> <p>6 Q So looking at the letter that is</p> <p>7 Exhibit 259, walk me through your understanding</p> <p>8 of the pricing options and the license options</p> <p>9 provided by FICO to you.</p> <p>10 A So the intent of this letter was</p> <p>11 to show us from legacy Chubb pricing to the new</p> <p>12 Chubb LTD pricing.</p> <p>13 And this was the first time for</p> <p>14 myself that I knew it was based upon revenue.</p> <p>15 I was not aware of that prior to this.</p> <p>16 So this is just -- this letter</p> <p>17 now outlines what the legacy Chubb revenue was</p> <p>18 in 2006 -- yeah, 2006.</p> <p>19 And then what the 2016 combined</p> <p>20 company revenues were, and then how Blaze</p> <p>21 was -- how the equation, how FICO priced their</p> <p>22 product.</p>

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<p style="text-align: right;">Page 178</p> <p>1 Q And you understood at this time</p> <p>2 that the pricing you were seeing was based on</p> <p>3 the estimated U.S. revenue of the new company,</p> <p>4 correct?</p> <p>5 A Correct.</p> <p>6 Q Not that you agreed with the</p> <p>7 pricing, just that that's what the new U.S.</p> <p>8 revenue was the basis for the pricing from</p> <p>9 FICO's perspective?</p> <p>10 A Correct.</p> <p>11 Q And Chubb rejected this offer,</p> <p>12 correct?</p> <p>13 A Yes.</p> <p>14 Q And why was that?</p> <p>15 MR. FLEMING: I'm going to object</p> <p>16 to the extent it requires disclosure of</p> <p>17 its attorney-client communications.</p> <p>18 On the basis of privilege you</p> <p>19 should not disclose those.</p> <p>20 A Can you ask your question again?</p> <p>21 Q Sure.</p> <p>22 Why did Chubb reject this offer?</p>	<p style="text-align: right;">Page 180</p> <p>1 her prior testimony, and it's multiple</p> <p>2 questions.</p> <p>3 A Can you repeat that again?</p> <p>4 Q Sure, I will try.</p> <p>5 Chubb rejected this offer in</p> <p>6 Exhibit 259, correct?</p> <p>7 A Yes.</p> <p>8 Q And the reason Chubb rejected</p> <p>9 this offer is -- well, I will ask it a</p> <p>10 different way.</p> <p>11 Was the reason Chubb rejected</p> <p>12 this offer because FICO bases its licensing</p> <p>13 figures on company revenue?</p> <p>14 A No.</p> <p>15 Q So the problem with this offer</p> <p>16 wasn't -- wasn't FICO's pricing models, it was</p> <p>17 instead the history between the parties and</p> <p>18 because Chubb thought it had already had a</p> <p>19 license, right?</p> <p>20 MR. FLEMING: Objection, multiple</p> <p>21 questions and misstates her prior</p> <p>22 testimony.</p>
<p style="text-align: right;">Page 179</p> <p>1 A Because once again, senior</p> <p>2 leadership felt that this was -- this license</p> <p>3 fee was still extremely high in comparison to</p> <p>4 the investment already made with FICO.</p> <p>5 Q Did you believe that -- well,</p> <p>6 Chubb's position in these business</p> <p>7 negotiations, it was not that -- Chubb didn't</p> <p>8 think it needed to pay a new license fee at</p> <p>9 all, did it?</p> <p>10 MR. FLEMING: I object to the</p> <p>11 extent it calls for attorney-client</p> <p>12 communications, which you should not</p> <p>13 disclose on the basis of privilege.</p> <p>14 A No, we didn't. We had a hard</p> <p>15 time with that.</p> <p>16 Q So the issue wasn't -- the</p> <p>17 problem from the business perspective from</p> <p>18 Chubb's point of view wasn't that FICO's</p> <p>19 pricing model was flawed, rather that Chubb</p> <p>20 already had a license and shouldn't be forced</p> <p>21 to pay more, correct?</p> <p>22 MR. FLEMING: I object, misstates</p>	<p style="text-align: right;">Page 181</p> <p>1 A No, there was -- we still had an</p> <p>2 issue with this pricing model.</p> <p>3 Q Chubb had a problem with the</p> <p>4 ultimate price, not necessarily the model,</p> <p>5 correct?</p> <p>6 MR. FLEMING: Objection, that's</p> <p>7 been asked and answered.</p> <p>8 A No, we had a problem with the</p> <p>9 model as well.</p> <p>10 Q Can you tell me what the problem</p> <p>11 with the model was?</p> <p>12 MR. FLEMING: I object to the</p> <p>13 extent it calls for attorney-client</p> <p>14 privileged communications.</p> <p>15 A If you take a look at the global</p> <p>16 revenue, it's \$14 billion at an estimate of \$11</p> <p>17 billion for \$2.4 million.</p> <p>18 In 2016 it was 20, but yet we</p> <p>19 were asked to pay double if not triple what we</p> <p>20 were paying from when we originally purchased.</p> <p>21 So, the calculation of how they</p> <p>22 came to 20, that was not disclosed, just that</p>